

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
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*This document relates to:*

*Federal Insurance Co. v. al Qaida*  
03 CV 06978 (RCC)

**PLAINTIFFS' MORE DEFINITE STATEMENT AS TO THE  
SAUDI COMMITTEE FOR RELIEF AND CHARITY WORK ABROAD**

1. In the wake of the September 11<sup>th</sup> Attack, international investigations into al Qaida's financial infrastructure revealed that numerous purported charities, operating under the control of the government of the Kingdom of Saudi Arabia, had long served as al Qaida's principal sources of financial and logistical support.
2. In this regard, the National Commission on Terrorist Attacks upon the United States (9/11 Commission) found that there was "a likelihood that charities with significant Saudi government sponsorship diverted funds to al Qaida."
3. The 9/11 Commission's Staff expanded on that finding in a subsequent Monograph on al Qaida's financing, explaining that "al Qaida was funded to the tune of approximately \$30 million per year, by diversions of money from Islamic charities and the use of well-placed financial facilitators who gathered money from both witting and unwitting donors, primarily in the Gulf region."
4. The 9/11 Commission Staff Monograph further states that "the intelligence community identified (Saudi Arabia) as the primary source of money for al Qaida both before

and after the September 11<sup>th</sup> attacks. Fund-raisers and facilitators throughout Saudi Arabia and the Gulf raised money for al Qaida from witting and unwitting donors and diverted funds from Islamic charities and mosques.”

5. On June 2, 2004, nearly three years after the September 11<sup>th</sup> Attack, the Kingdom of Saudi Arabia finally bowed to intense international pressure and announced that it would be dissolving all of its international charities, and folding their operations into a new government agency, to be called the Saudi Committee for Relief and Charity Work Abroad.

6. The Saudi Committee for Relief and Charity Work Abroad is an agency, instrumentality and/or organ of the Kingdom of Saudi Arabia.

7. Since June 2, 2004, the operations of several of al Qaida’s prominent charity fronts have been folded into the Saudi Committee for Relief and Charity Work Abroad, including the operations of al Haramain Islamic Foundation, Benevolence International Foundation, Waqf Foundation, The Saudi Joint Relief Committee for Kosovo and Chechnya, and the Saudi High Commission for Bosnia and Herzegovina (hereinafter the “predecessor charities”).

8. The Saudi Committee for Relief and Charity Work Abroad has acquired the assets and obligations of the predecessor charities, and is continuing the operations of those predecessor charities, using the same facilities and personnel throughout the World.

9. As successor in interest to the assets, liabilities and operations of al Haramain Islamic Foundation, Benevolence International Foundation, Waqf Foundation, the Saudi Joint Relief Committee for Kosovo and Chechnya and Saudi High Commission for Bosnia and

Herzegovina, the Saudi Committee for Relief and Charity Work Abroad is legally responsible for the tortious conduct and debts of those predecessor charities.

Respectfully submitted,

COZEN O'CONNOR

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